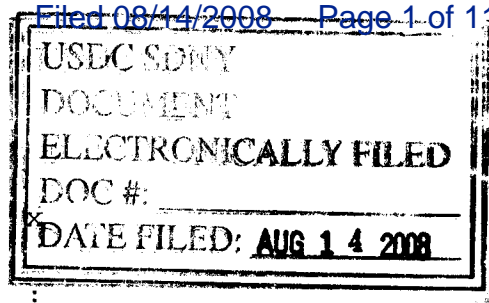


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

- v. -

IDA SUSANA PRIETO FRIEDERICH,
a/k/a "Ideli Prieto,"

Defendant.

08 CRIM 762
INDICTMENT
08 Cr. _____

:

:

X

COUNT ONE

(Conspiracy to Commit Stalking)

The Grand Jury charges:

Relevant Persons and Entities

1. At all times relevant to this Indictment, IDA SUSANA PRIETO FRIEDERICH, a/k/a "Ideli Prieto," the defendant, was employed by General Electric Company ("GE"). At certain times relevant to this Indictment, PRIETO was employed within GE's Corporate Audit Staff ("CAS"), a two-plus year audit and leadership program designed to expose high potential employees to intensive on-the-job development and to different businesses within GE.

2. In or about 2005, two individuals were hired into the CAS program ("Victim-1" and the "Auditor"). IDA SUSANA PRIETO FRIEDERICH, a/k/a "Ideli Prieto," the defendant, was hired into the CAS program in or about 2006. PRIETO, Victim-1, and the Auditor became friendly with one another, and the three often socialized together.

JUDGE PAUL G. GARDA

3. In or about late 2006, both Victim-1 and PRIETO were promoted to the next level within the CAS program. At the same time, the Auditor was passed over and later moved to another position within GE. At approximately the same time, the relationship between Victim-1 and the Auditor began to fray, and, by in or about January 2007, Victim-1 and the Auditor essentially had ceased their friendly relationship. Also in or about early 2007, PRIETO began to receive a series of poor reviews, and became aware that she was unlikely to be promoted again. Indeed, in or about late 2007, PRIETO was not promoted and, in or about May 2008, PRIETO transferred to a GE job in Mexico City, Mexico. In contrast, in or about late 2007, Victim-1 was again promoted within the CAS program.

The Email Campaign Directed At Victim-1

4. Certain GE employees are assigned a corporate GE email address ("GE account"), and may access both their GE addresses and personal and/or external email addresses from their GE-issued computers.

5. Beginning in or about March 2007, Victim-1, via her GE account, began to receive emails that purported to originate either directly from the Auditor or from associates of the Auditor. In general, these early emails lambasted Victim-1 for her disloyalty, selfishness, and blind professional ambition. Later, the GE account of IDA SUSANA PRIETO FRIEDERICH, a/k/a

"Ideli Prieto," the defendant, also was copied on these emails, and the emails began to blame PRIETO for her association with and loyalty to Victim-1. Many of these emails, which were sent to the GE accounts of Victim-1, PRIETO, and other GE employees, threatened to damage the careers of Victim-1 and PRIETO and also to destroy their friendship.

6. Beginning in or about early 2008 and escalating in or about the Spring of 2008, at approximately the same time that IDA SUSANA PRIETO FRIEDERICH, a/k/a "Ideli Prieto," the defendant, failed to be promoted within CAS and Victim-1 was promoted to a higher position within CAS, the emails to the GE accounts of Victim-1 and PRIETO became more threatening, aggressive, and, at times, vulgar. The emails described in this Paragraph and in Paragraph 5 above, which also referenced the home address of Victim-1's family in Europe, had the effect of greatly frightening Victim-1.

7. Unbeknownst to Victim-1, the emails to the GE accounts of Victim-1 and IDA SUSANA PRIETO FRIEDERICH, a/k/a "Ideli Prieto," the defendant, described in Paragraphs 5 and 6 above, were originated by PRIETO herself, along with at least one associate of PRIETO's, a co-conspirator not named as a defendant herein ("CC-1"). For example, PRIETO and CC-1 shared with each other, via email, certain passwords for email accounts from which certain of the emails described in Paragraphs 5 and 6, above,

originated, and discussed the contents of certain of the emails described in Paragraphs 5 and 6, above.

8. In or about April 2008, IDA SUSANA PRIETO FRIEDERICH, a/k/a "Ideli Prieto," the defendant, informed Victim-1 that PRIETO had received an email containing very sensitive personal information about PRIETO, and that the sender of the email threatened to publish the contents of the email to the entirety of the CAS program. In fact, this email originated from an email account to which PRIETO herself had access. On or about April 19, 2008, PRIETO flew from Mexico to New York City to discuss this email with Victim-1 and to show Victim-1 the text of the email. Victim-1 picked PRIETO up from JFK airport, and together they drove through the Bronx and Westchester, New York, to stay in Connecticut. PRIETO's travel to New York with this information was deeply distressing to Victim-1.

9. In or about June 2008, IDA SUSANA PRIETO FRIEDERICH, a/k/a "Ideli Prieto," the defendant, informed Victim-1 that an unknown person had let out the air from PRIETO's tires near her residence in Mexico City, Mexico; that an unknown man had attempted to enter PRIETO's building in Mexico City, leaving a message with the doorman that PRIETO would be killed; and that PRIETO had discovered vulgar graffiti on her apartment building wall, referencing Victim-1. On or about June 11, 2008, PRIETO flew from Mexico to New York City, and then traveled through the

Bronx and Westchester, New York, en route to Connecticut. On or about June 12, 2008, PRIETO traveled from Connecticut to Westchester, New York, where she remained until she relocated to Manhattan, on or about June 17, 2008. While in Westchester and Manhattan, PRIETO sent or caused to be sent a number of emails to Victim-1 that were frightening to Victim-1. In addition, Victim-1's belief that PRIETO had flown to New York from Mexico out of fear for her life also was deeply distressing to Victim-1.

Statutory Allegations

10. From at least in or about early 2007, up to and including on or about June 19, 2008, in the Southern District of New York and elsewhere, IDA SUSANA PRIETO FRIEDERICH, a/k/a "Ideli Prieto," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States of America, to wit, a violation of Title 18, United States Code, Section 2261A(1).

11. It was a part and an object of the conspiracy that IDA SUSANA PRIETO FRIEDERICH, a/k/a "Ideli Prieto," the defendant, and others known and unknown, unlawfully, willfully, and knowingly would and did travel in interstate and foreign commerce with the intent to kill, injure, harass, and place under surveillance with intent to kill, injure, harass, and to intimidate another person, and in the course of, and as a result

of, such travel, did place that person in reasonable fear of the death of, and serious bodily injury to, and did cause substantial emotional distress to, that person, a member of the immediate family of that person, and the spouse of that person, in violation of Title 18, United States Code, Section 2261A(1).

Overt Acts

12. In furtherance of the conspiracy and to effect the illegal object thereof, IDA SUSANA PRIETO FRIEDERICH, a/k/a "Ideli Prieto," the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about April 19, 2008, PRIETO traveled through the Bronx and Westchester with Victim-1 en route from Mexico to Connecticut.

b. On or about April 22, 2008, PRIETO and CC-1 exchanged emails.

c. On or about June 11, 2008, PRIETO traveled through the Bronx and Westchester en route from Mexico to Connecticut.

d. On or about June 12, 2008, PRIETO traveled from Connecticut to Westchester, New York.

e. On or about June 15, 2008, while in White Plains, New York, PRIETO sent or caused to be sent an email to Victim-1 and another individual.

f. On or about June 17, 2008 PRIETO traveled from White Plains, New York to New York, New York.

g. On or about June 18, 2008, while in New York, New York, PRIETO sent or caused to be sent an email to Victim-1 and another individual.

(Title 18, United States Code, Section 371).

COUNT TWO

(Stalking)

The Grand Jury further charges:

13. The allegations set forth in paragraphs 1 through 9 and 12 are repeated and realleged as if set forth fully herein.

14. In or about April 2008, in the Southern District of New York and elsewhere, IDA SUSANA PRIETO FRIEDERICH, a/k/a "Ideli Prieto," the defendant, unlawfully, willfully, and knowingly did travel in interstate and foreign commerce with the intent to kill, injure, harass, and place under surveillance with intent to kill, injure, harass, and to intimidate another person, and in the course of, and as a result of, such travel, did place that person in reasonable fear of the death of, and serious bodily injury to, and did cause substantial emotional distress to, that person, a member of the immediate family of that person, and the spouse of that person, to wit, PRIETO traveled from Mexico to Connecticut, via the Bronx and Westchester, New York, with the intent to harass and injure Victim-1 and Victim-1's family, and placed Victim-1 in reasonable fear of serious bodily

injury to Victim-1 and Victim-1's family, and caused them substantial emotional distress.

(Title 18, United States Code, Sections 2261A(1) and 2.)

COUNT THREE

(Stalking)

The Grand Jury further charges:

15. The allegations set forth in paragraphs 1 through 9 and 12 are repeated and realleged as if set forth fully herein.

16. In or about June 2008, in the Southern District of New York and elsewhere, IDA SUSANA PRIETO FRIEDERICH, a/k/a "Ideli Prieto," the defendant, unlawfully, willfully, and knowingly did travel in interstate and foreign commerce with the intent to kill, injure, harass, and place under surveillance with intent to kill, injure, harass, and to intimidate another person, and in the course of, and as a result of, such travel, did place that person in reasonable fear of the death of, and serious bodily injury to, and did cause substantial emotional distress to, that person, a member of the immediate family of that person, and the spouse of that person, to wit, PRIETO traveled from Mexico to Connecticut, via the Bronx and Westchester, New York, and from Connecticut to Westchester, New York, with the intent to harass and injure Victim-1 and Victim-1's family, and placed Victim-1 in reasonable fear of serious bodily injury to Victim-1

and Victim-1's family, and caused them substantial emotional distress.

(Title 18, United States Code, Sections 2261A(1) and 2.)

COUNT FOUR

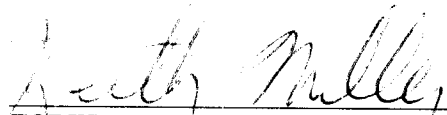
(False Statements)

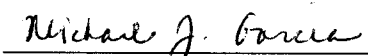
17. The allegations set forth in paragraphs 1 through 9 and 12 are repeated and realleged as if set forth fully herein.

18. On or about June 19, 2008, in the Southern District of New York and elsewhere, IDA SUSANA PRIETO FRIEDERICH, a/k/a "Ideli Prieto," the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, unlawfully, knowingly, and willfully did falsify, conceal, and cover up by trick, scheme, and device material facts, and did make materially false, fictitious, and fraudulent statements and representations, to wit, PRIETO stated to agents with the Federal Bureau of Investigation that, among other things, she had not written any harassing or threatening emails to Victim-1 and that she did not have a certain external computer hard drive in her possession, whereas in fact she had written

such emails to Victim-1, and she did have such an external computer hard drive in her possession.

(Title 18, United States Code, Sections 1001(a)(1) and (a)(2).)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES OF AMERICA

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IDA SUSANA PRIETO FRIEDERICH,

Defendant.

INDICTMENT

08 Cr.

(Title 18, United States Code, Section 371, 2261A(1), 1001).

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL

Heath Miller
Foreperson.

*Indictment filed.
Case assigned to Judge
Fatterman
Patterson*

*6/14/08
(2)*